

Exhibit C

David Rothstein

From: David Rothstein <drothstein@rothsteinlawfirm.com>
Sent: Friday, March 13, 2015 2:12 PM
To: 'Kathryn Thomas'; 'kathy.helms@ogletreedeakins.com'; 'Todd.Timmons@ogletreedeakins.com'; 'Fred Williams'
Subject: RE: Irani

Kathryn. I cannot give you a date at this point, but I am perfectly willing to hold the deadline on the motion to compel in abeyance until I do respond. Realistically, we have scheduled approximately 15 depositions in the Platinum Plus case over the next two weeks, and I have a very contentious school board hearing in Spartanburg County next Wednesday night. The earliest I would likely be able to get you more information to respond to your concerns would be March 25. I could commit to getting you something by March 31. I would even agree that your 21 days under the rule for filing a motion to compel would not even start until then. In my entire legal career, I have never called time on an opposing counsel on the 21-day rule, because I think it is a bad rule. I still think we need to have a telephone conference with Judge West, as I stated to her in my letter from earlier today. Dave.

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-----Original Message-----

From: Kathryn Thomas [<mailto:kthomas@gsblaw.net>]
Sent: Friday, March 13, 2015 10:36 AM
To: kathy.helms@ogletreedeakins.com; Todd.Timmons@ogletreedeakins.com; Fred Williams; drothstein@rothsteinlawfirm.com
Subject: Irani

David --

If you will specify a date by which you will address our concerns, we will hold off filing a motion to compel. Please let me know by 1pm today.

-----Original Message-----

From: Kay_Tennyson@scd.uscourts.gov [mailto:Kay_Tennyson@scd.uscourts.gov] On Behalf Of west_ecf@scd.uscourts.gov
Sent: Friday, March 13, 2015 9:46 AM
To: Kathryn Thomas; kathy.helms@ogletreedeakins.com; Todd.Timmons@ogletreedeakins.com; Fred Williams; drothstein@rothsteinlawfirm.com
Subject: 14-3577-CMC-KDW Irani Follow-up on email to Judge Currie's chambers

Counsel:

J. Currie's chambers forwarded to Judge West the email from Ms. Thomas regarding a discovery dispute with an apparent deadline of today (March 13, 2015) for her filing a motion to compel to protect her clients' interests.

Judge West appreciates counsel's following the court's instructions to seek informal resolution through a telephone conference as the scheduling order requires. Counsel, particularly Plaintiff's counsel, are reminded that the scheduling order also requires counsel to have consulted and attempted to resolve the matter as required by Local Civil Rule 7.02 (D.S.C.) prior to contacting the court. Based on the information provided to the court in this instance, it seems Plaintiff's counsel has not been responsive to Ms.

Thomas's efforts to consult. Accordingly, conference with the court is unlikely to be productive, and counsel should file any necessary motion to compel, absent an appropriate written agreement to extend the motion to compel deadline. See Local Civ. Rule 37.01(A) (D.S.C.). Any motion resolved after filing may be withdrawn.

Thank you.

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